

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS

BRANDON HAMMAN,

Plaintiff,

v.

The CITY OF CARBONDALE, an Illinois
municipal corporation, JOHN LENZINI,
in his individual and official capacities,
and LENOARD JAMIE SNYDER, in his
individual and official capacities,

Defendants.

Case No. 3:25-cv-00736-NJR

Chief Judge Nancy J. Rosenstengel

PARTIES' STIPULATIONS

The parties, through their respective counsel, hereby stipulate to the following facts for purposes of the preliminary injunction hearing only. These stipulations are made without prejudice to either party's position at trial on the merits:

1. The parties stipulate that the listed witnesses have personal knowledge of the matters about which they are expected to testify.
2. Parties stipulate to the authenticity of Carbondale Ordinance § 15.4.10.8.
3. The parties stipulate that Plaintiff's video exhibit, the body camera footage that Brandon Hamman took on April 16, 2025, is authentic and admissible. They likewise stipulate that Defendants' video exhibits, the body camera footage taken by police officers on April 16, 2025, is authentic and admissible.

4. The parties both waive objections on completeness grounds if excerpted clips of videos should be played during the hearing.

5. Parties stipulate that the photographs submitted by both parties as evidence are accurate and admissible photographs of what they depict.

6. Parties stipulate to the authenticity of Police Report Case No. 2025-00016197.

7. Parties stipulate to the authenticity of Defendants' exhibit "Site Plan."

Submitted: August 6, 2025

Respectfully submitted,

s/ Nathan J. Moelker

Nathan J. Moelker

Kelsey E. McGee

Christina A. Compagnone

Liam R. Harrell

AMERICAN CENTER FOR LAW & JUSTICE

201 Maryland Avenue, NE

Washington, DC 2002

Tel: (202) 641-9160

Fax: (202) 546-9309

Email: nmoelker@aclj.org

Counsel for Plaintiff

/s/ A. Courtney Cox

A. Courtney Cox, #6182590

John L. Gilbert, #954101

Philip J. Lading, #6271659

101 W. Vandalia Street, Suite 300

Edwardsville, IL 62025

618-659-9861

618-659-9862 (Fax)

Email: ccox@sandbergphoenix.com

Email:

jgilbert@sandbergphoenix.com

Email:

plading@sandbergphoenix.com

Attorneys for Defendants

City of Carbondale, an Illinois municipal corporation, John Lenzini, in his individual and official capacities, and Lenoard Jamie Snyder in his individual and official capacities

CERTIFICATE OF SERVICE

I hereby certify that on the 6th day of August, 2025, a true and correct copy of the above and foregoing document was filed electronically with the Clerk of the Court and was served upon all counsel of record via PACER.

/s/ Nathan J. Moelker

Nathan J. Moelker

AMERICAN CENTER FOR LAW & JUSTICE

201 Maryland Avenue, NE

Washington, DC 2002

Tel: (202) 641-9160

Fax: (202) 546-9309

Email: nmoelker@aclj.org

Counsel for Plaintiff